

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DISTRICT**

ALEXANDRE LAING,)	
)	
Petitioner/Counter-Defendant,)	Case No. 1:24-cv-10901
)	
v.)	Judge April M. Perry
)	
JACLYN FORTINI LAING,)	Magistrate Judge Maria Valdez
)	
Respondent/Counter-Plaintiff.)	

**AGREED MOTION FOR
MODIFICATION OF AGREED ORDER**

Respondent/Counter-Plaintiff Jaclyn Fortini Laing (“Jaclyn”) and Petitioner/Counter-Defendant Alexandre Laing (“Alexandre”) (collectively, the “Parties”), by and through their respective counsel, move for modification of the December 5, 2024 Agreed Order (“Agreed Order”). A proposed order is attached as Exhibit 1 hereto (“Proposed Order”). In support, the Parties state as follows:

1. On December 5, 2024, the Court entered an agreed order prohibiting either party from removing the Parties’ minor children (the “Children”) or causing the children to be removed from the jurisdiction of this Court pending final disposition of this matter. (Dkt. 22.)
2. Alexandre wishes to travel to Michigan with the Children between July 28 and August 3, 2025.
3. Jaclyn has agreed to this travel.
4. Accordingly, the Parties have agreed to modification of the Agreed Order that will permit Alexandre to travel with the Children outside the jurisdiction of this Court between July 28 and August 3, 2025.

5. Pursuant to Judge Perry's Standing Order, a Word version of the Proposed Order has been sent to Proposed_Order_Perry@ilnd.uscourts.gov.

WHEREFORE, the Parties request that the Court modify the Agreed Order to permit Alexandre to travel with the minor children between July 28 and August 3, 2025, and any such other relief as the Court deems just and proper.

Dated: July 25, 2025

ALEXANDRE LAING

By: /s/ Phillip Brigham

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JACLYN FORTINI LAING

By: /s/ Rachel Ellen Simon

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